

SEP 16 2013

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The Honorable Robert F. Kelly
United States District Court for the
Eastern District of Pennsylvania
United State Courthouse Room 11613
601 Market Street
Philadelphia, PA 19106

Re: *Rubin v. Amerihealth Administrators, et al.*
E.D. Pa. No. 12-3719-RK
DBMP File No. 06599

Dear Judge Kelly:

You will recall that plaintiff's counsel and myself forwarded a joint request to Your Honor on August 29th requesting an additional 21 days to submit our joint pretrial order in this case. This letter will serve as a second joint request for an additional extension to file that same joint pretrial order based upon the efforts of both counsel to schedule to remaining discovery that needs to be conducted before the trial of this case.

As a result of Your Honor's order denying the defendant's Motion for Summary Judgment both sides have determined that depositions need to be conducted of certain witnesses in Massachusetts as well as additional witnesses here in the Philadelphia area.

We have succeeded in scheduling those Massachusetts beginning on October 1st and we are currently in the process of scheduling the Philadelphia depositions as well. We will continue to jointly move forward as expeditiously as possible to complete this discovery but would ask Your Honor's indulgence in granting us an additional 15 days after the conclusion of these depositions to file the joint pretrial order.

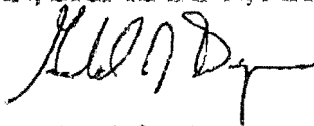
Hon. Robert F. Kelly
September 16, 2013
Page 2

We greatly appreciate Your Honor's consideration of this joint requested.

Sincerely,

Respectfully submitted,

DUGAN, BRINKMANN, MAGINNIS and PACE

A handwritten signature in black ink, appearing to read "GJD", with a stylized flourish extending from the end.

GERALD J. DUGAN

GJD/bcr

cc: Mark S. Pinnie, Esquire
Via E-Mail – mpinnie@bmplaw.net